

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
:   
MICHAEL GEORGE SCHWENTNER and : CHAPTER 13  
JOY N. SCHWENTNER, :  
:   
Debtors : BKRTCY. NO. 16-11037 elf

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NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE

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Michael Schwentner and Joy Schwentner, by and through their counsel, Kevin K. Kercher, Esquire, have filed a Motion to Modify Plan Post-Confirmation. The change in the Plan is that the Debtors are proposing to surrender their properties in Memphis, Tennessee, because they can no longer service the debt associated with the properties.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, If you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **September 30, 2019** you or your attorney must do all of the following:

(a) file an answer explaining your position at

Clerk, U.S. Bankruptcy Court  
The Madison Bldg.  
400 Washington St., Ste. 300  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

LAW OFFICES OF KEVIN K. KERCHER, ESQUIRE, P.C.  
Kevin K. Kercher, Esquire  
881 Third Street, Suite #C-2  
Whitehall, PA 18052  
(610) 264-4120 phone  
(610) 264-2990 fax

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Erik L. Frank on **October 10, 2019, at 11:00 a.m.** in Courtroom #1, United States Bankruptcy Court, The Madison Building, 400 Washington Street, Reading, PA 19601.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 9/9/2019

Attorney for Movants

/s/ Kevin K. Kercher

**Kevin K. Kercher, Esquire**  
**881 Third Street, Suite #C-2**  
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